

## REMARKS

Applicants request favorable reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks.

Claims 1 and 4-21 are pending in the present application. Claims 1, 6-11, 13, 14, 17, 20, and 21 are the independent claims.

Claims 2 and 3 have been cancelled. Claims 1, 6-11, 13, and 14 have been amended and new Claims 15-21 have been added. Applicants submit that support for the amendments and the new claims can be found in the original disclosure, and therefore, no new matter has been added. For example, the amendments to Claims 1 and 6-10 are supported at least by the description of the first embodiment, including Fig. 5 and the description at page 12, lines 5-22 of the specification. The amendments to Claims 11-14 are supported at least, for example, in the description of the second embodiment, including Figs. 31, 32, and 54 and page 56, lines 23 *et seq.* New Claims 15 and 16 are supported at least by Fig. 17 and new Claims 17-21 are supported at least by Fig. 18 and the related description.

Claims 1-14 stand rejected under 35 U.S.C. §112, 2<sup>nd</sup> paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The claims have been amended in view of the Examiner's comments, and Applicants believe the objections have been addressed. Favorable reconsideration and withdrawal of this rejection are requested.

Claims 1-6 stand rejected under 35 U.S.C. §102(e), as being anticipated by U.S. Patent No. 6,088,123 (Adler, et al.). Claims 8-10 stand rejected under 35 U.S.C. §102(b), as being anticipated by U.S. Patent No. 5,734,752 (Knox). Claim 7 stands

rejected under 35.U.S.C. §103(a) as being unpatentable over Adler, et al. Applicants respectfully traverse these rejections for the reasons discussed below.

As recited in Claim 1, the present invention includes, *inter alia*, the features of generation means for generating a binary mask pattern having a blue noise characteristic, each bit in the mask pattern indicating either a target embedding position or a non-target embedding position represented by binary information, and embedding means for modulating image data corresponding to the target embedding positions to embed predetermined information, while not modulating image data corresponding to non-target embedding positions. Applicants submit that the cited art fails to disclose or suggest at least these features. Instead, Adler et al. merely discloses an algorithm for modulating pixels to embed information into an image, but is silent about using a mask pattern having a blue noise pattern and in which each bit indicates either a target embedding position or a non-target embedding position represented by binary information. Similarly, Knox also is not read to disclose or suggest at least those features. Accordingly, Applicants submit that Claim 1 is patentable over the cited art.

Claims 6 and 7 are respectively directed to a method and storage medium having features similar to those of Claim 1. Claims 8-10 are respectively directed to an apparatus, method, and storage medium for extracting information embedded in image data and recite features similar to those discussed regarding Claim 1. Those claims are believed to be allowable for reasons similar to Claim 1.

Applicants note that no prior art rejection was made against Claims 11-14. Moreover, Applicants submit that the cited art does not disclose or suggest at least the feature recited in those claims of making each coefficient of a two-dimensional mask

correspond to respective bit information of additional information, each coefficient being represented in multilevel to identify a priority for embedding the bit information of the additional information. Accordingly, those claims are also believed allowable. In addition, new independent Claims 17, 20, and 21 are directed to extracting embedded information and recite similar features to those in Claims 11-14. Claims 17, 20, and 21 are believed allowable for similar reasons.

In view of the foregoing, this application is believed to be in condition for allowance. Favorable reconsideration, withdrawal of the outstanding rejections, and an early Notice of Allowance are requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,



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